

OUTTEN & GOLDEN LLP

Justin M. Swartz (JS 7989)
Molly A. Brooks (MB 2360)
Sally J. Abrahamson (admitted *pro hac vice*)
3 Park Avenue, 29th Floor
New York, New York 10016
Telephone: (212) 245-1000

GETMAN & SWEENEY, PLLC

Michael J.D. Sweeney (MS 7959)
Artemio Guerra (AG 2005)
9 Paradies Lane
New Paltz, New York 12561
Telephone: (845) 255-9370

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

ANTHONY CHARLOT, ALAN REMACHE, and
JOSE TEJADA, individually and on behalf all
others similarly situated,

Plaintiffs,

12-cv-04543 (KAM)(VMS)

v.

ECOLAB, INC.,

Defendant.

**PLAINTIFFS' NOTICE OF MOTION FOR
LEAVE TO FILE AN AMENDED COMPLAINT**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of their Motion for Leave to File an Amended Complaint, and in the Declaration of Justin M. Swartz and the exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) Granting Plaintiffs leave to file the Amended Complaint; and
- (2) Granting such further relief as the Court deems just and proper.

Dated: New York, New York
June 12, 2014

Respectfully submitted,

OUTTEN & GOLDEN LLP

By:

/s/ Justin M. Swartz
Justin M. Swartz (JS 7989)

Molly A. Brooks (MB 2360)
Sally J. Abrahamson (admitted *pro hac vice*)
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Attorneys for Plaintiffs and the Putative Class